EXHIBIT "K"

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EXECUTIVE CAR WASH OF MAPLE GLEN

NO. 02-CV-3747

v.

ENVIRONMENTAL INC.

and

ENVIRONMENTAL HAZARD SERVICES, INC.

v.

ATLANTIC PETROLEUM TECHNOLOGIES, INC. :

PLAINTIFF'S SUPPLEMENTAL ANSWERS TO INTERROGATORIES DIRECTED TO PLAINTIFF, EXECUTIVE CAR WASH OF MAPLE GLEN

GENERAL OBJECTIONS

Plaintiff, Executive Car Wash of Maple Glen, incorporates all previously-stated objections to Defendants' Interrogatories. Without waiver of those objections, Plaintiff supplements its answers to the Interrogatories below:

ANSWERS TO INTERROGATORIES

- 4. Dr. Robert Marion, Curriculum Vitae previously supplied.
- 5. Dr. Marion will testify that the underground storage tanks should have been discovered and/or that as part of the Phase I examination, that it should have been noted that additional investigation was required, said investigation which would have uncovered the underground storage tanks.

Dr. Merion examined the Phase I studies, reports of Bell Environmental, as well as the documentation indicated in his previous reports, all of which have been previously produced.

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Dated: February _______, 2004